WYOMING GAME AND FISH DEPARTMENT

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U.S. Forest Service
Medicine Bow-Routt National Forests
And Thunder Basin National Grassland
Medicine Bow Landscape Vegetation Analysis (LaVA) Project
Draft Environmental Impact Statement
Albany and Carbon Counties

Melissa Martin
Planning and Information Program Manager
U.S. Forest Service
2468 Jackson Street
Laramie, WY 82070

Dear Ms. Martin,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed Medicine Bow Landscape Vegetation Analysis (LaVA) Project Draft Environmental Impact Statement (DEIS) located in Albany and Carbon Counties.

The Department has been actively involved in planning of the LaVA project since before the project was scoped. We appreciate that cooperators will be actively involved in the planning, implementation and monitoring of treatments under LaVA. We are supportive of the project because it will have many benefits for habitat, wildlife and sportsmen:

- LaVA goes hand-in hand with our Mule Deer Initiative to implement habitat improvement projects focusing on regeneration and expansion of mixed mountain shrub and aspen habitats in big game summer and transitional range habitats. LaVA also provides better opportunity to leverage funds for habitat treatments.

- While the large tracts of downed trees can increase hiding cover for elk, it can make it more difficult for hunters to access locations to hunt on foot or horseback. LaVA presents an opportunity to break up some of these large tracts of downed timber and create a more natural landscape with diverse age classes and types of vegetation.

- Treating the forest on a landscape scale will help to allow natural wildfire back on the landscape, while reducing the potential for excessive sediment loading to streams, wetlands and other fish and amphibian habitat from uncontrolled wildfire.

The effects analysis for lynx in the DEIS indicates the project implementation of LaVA would be likely to adversely affect lynx. We believe this conclusion overly estimates impacts to lynx for several reasons. The LaVA Project was specifically designed around lynx habitat. In fact, the Accounting Units are based on the Lynx Analysis Units (LAUs) in the Southern Rockies Lynx Amendment to ensure lynx and their habitat is protected. LaVA also uses additional adaptive implementation and monitoring, with checklists and triggers, to ensure lynx habitat and other resources are protected. The DEIS assessment appears to focus on short-term impacts but does not appear to account for the long-term benefits from treatment. We would like to meet with the U.S. Forest Service and cooperators to refine the adaptive implementation and monitoring triggers to ensure that treatments in this project do not degrade lynx habitat.

We believe the risk of large-scale uncontrolled wildfire under the no action alternative presents a substantial risk to lynx habitat, as well as habitat for many other species. The DEIS lacks thorough discussion of how current and trending conditions on Medicine Bow National Forest (the Forest) increases the chance and severity of wildfire under the No Action Alternative. The DEIS also does not adequately discuss how treatments under the Modified Proposed Action would create fuel breaks and different vegetative communities which would reduce the potential for large-scale catastrophic wildfire. We recommend the FEIS includes more discussion and comparison of the effects of catastrophic wildfire in the two alternatives.

Please consider the following specific comments when drafting the FEIS.

<u>Chapter 2: Alternatives Including the Proposed Action</u>
Alterative 1 No Action:

- Page 28 – The discussion of Alternative 1 gives the impression that if Alternative 1 is selected there will not be any timber sales on the Forest. Under the No Action Alternative discussions, the FEIS should clarify that timber sales and vegetation treatments will occur similarly to how they are conducted at this time, following National Environmental Policy Act (NEPA) procedures for individual sales using Environmental Assessments, etc.

Vegetation Treatment Options:
Green Tree, Shrub, and Grassland Treatment Options (up to 100,000 acres)

- Pgs. 34-35 – This section only describes this vegetation treatment option for the purposes of fuel reduction. Please include discussion of treatment for the purpose of wildlife habitat enhancement.

<u>Chapter 3: Affected Environment and Environmental Consequences</u>
Analysis Assumptions – Basis for Accounting Units:

- Pgs. 62-63 – The last analysis assumption states that equivalent clearcut area (ECA) has been modeled after 6th-level watershed scale, while the accounting units were developed by overlaying lynx analysis units with 7th-level watershed boundaries. The FEIS should clarify how ECAs analyzed at the 6th-level watershed scale work within the accounting unit system.

Biological Resources:
Timber: Affected Environment

- Pg. 82 – "The acres and size class distribution of each cover type is depicted in table 26 and 27." However, there is no size class distribution information in either of those tables. It would be helpful to provide a citation for where this information came from, such as from a recent survey, a recently developed GIS layer, or based on the 2003 Forest Plan.

Timber: Environmental Consequences
Direct and Indirect Effects: No Action Alternative – Aspen

- Pg. 89 – Depending on the definition of high intensity wildfire, it has been shown that high intensity wildfires result in the highest levels of aspen ramet regeneration from the roots (Krasnow and Stephens 2015). However, heavy fuel loading with lengthy flame residence times can kill aspen roots. The role of natural wildfire in healthy forest systems should not be diminished.
- Pg. 89 – Please discuss the fact that the mesic nature of aspen communities make them natural firebreaks on the landscape, and with their continued decline under the No Action alternative, we would not only have an increased fuel problem but fewer natural fire breaks.

Fire and Fuels: Affected Environment
Fire History

- Pg. 94 – We suggest updating this information to include the 20,000+ acre Badger Creek Fire and the 30,000+ acre Beaver Creek Fire since they are indicative of the current trend toward fires of increasing intensity and magnitude due to beetle mortality.

Fire Regime: Quaking Aspen

- Pg. 96 – See comments for page 89. Please make it clear that seral aspen are a fire regenerating species and discuss the positive role of natural wildfire in healthy forest conditions.

Wildlife: Environmental Consequences – Direct and Indirect Effects
Pg. 128, Table 40

- Given the design criteria and triggers that are described as being part of project design, the determination of "May affect, likely to adversely affect" should be mitigated prior to implementation. Mitigation of impacts through design criteria and triggers should be discussed under the Southern Rockies Lynx Amendment Criteria section as well (pg. 129). The effects of catastrophic wildfire on lynx habitat do not appear to be considered in the determination of "no effect" under the No Action Alternative. We recommend re-evaluating impacts to lynx in the FEIS, in consideration of the triggers and the Southern Rockies Lynx Amendment requirements.
- Several of the species listed as no impact under the no action alternative and MII under the modified proposed action are listed in the species description section as having aspen as an important component to their habitat needs. As such, it could be argued that no action would

have an impact on these species, since aspen communities continue to decline with the lack of disturbance and that the proposed action would increase suitable habitat in the future.

- The treatments in the Modified Proposed Action would increase line of site and decrease forested areas that fragment bighorn sheep habitat. The determination of effects for bighorn sheep appear to be inaccurate since their habitats would be improved by the proposed treatments. Please consider reevaluating.

Wildlife: Environmental Consequences – Cumulative Effects
Canada Lynx – No Action and Modified Proposed Action Alternatives (Pg. 133)

- "It is assumed all suitable habitat on private and State lands in lynx analysis units in the project area will be converted to unsuitable condition." This statement is made in both the No Action and Modified Proposed Action sections and needs further explanation.
- There is no discussion of the effects of catastrophic wildfire on lynx habitat under the no action alternative. This would most certainly result in a significant loss of suitable habitat on the forest.
- Please include discussion of the design criteria and triggers that would be applied to mitigate impacts to lynx habitat within the proposed action section, and re-evaluate effects in the FEIS.

Region 2 Sensitive Species, MIS, and Species of Local Concern – No Action Alternative

- Pg. 133 – "There would be no cumulative effects since there are no direct or indirect effects." This statement seems to be an insufficient analysis. There is a significant lack of discussion on how current and trending conditions would increase the chance and severity of wildfire under the No Action alternative. Certainly large wildfires would result in the loss of habitat for these species and have a significant impact directly, indirectly, and cumulatively.

Aquatic Species – Affected Environment

- Pg. 134 – The following statement is inaccurate: "Additionally, there is no suitable habitat in the project area for threatened, endangered, proposed, or candidate fish or amphibian species." Both the Boreal Toad and Colorado River Cutthroat Trout have been proposed for listing; therefore, the document needs to reflect that suitable habitat occurs in the project area for those species.

Botany: Environmental Consequences – Direct and Indirect Effects

- Pg. 144 – The discussion under the No Action Alternative states there would be less habitat disturbance and noxious weed spread. There is no discussion of the extreme habitat disturbance and noxious weed issues that would occur from large-scale, intense wildfires that are trending under current conditions.
- Pg. 145 – Under the modified proposed action discussion in this section, wildfire and prescribed fire are described as similar. However, prescribed fires (broadcast burns) are generally conducted under much less extreme conditions, and rather held to a prescription

that mitigates some of the negative effects described. Perhaps making a distinction between prescribed broadcast burning, prescribed pile burning, and wildfire would be appropriate.

- Pg. 145 – "Wetlands, riparian areas, and associated vegetation could the most vulnerable rare plant habitats in the analysis area because they are the most uncommon on the landscape and could be easily damaged by canopy removal and operation of heavy machinery." This statement implies that because habitats are uncommon they are vulnerable. This does not account for the protection of these areas in the Forest Plan, design criteria for LaVA, Forestry BMPs, etc. Please include discussion of how these areas are protected from harvest practices.

Noxious Weeds and Other Invasive Plants: Environmental Consequences – Direct and Indirect Effects & Cumulative Effects

- We would like to see more discussion of how large-scale, high intensity wildfire would be more likely under the No Action alternative and how such wildfires could drastically increase noxious weeds and invasive plant populations.

Appendix A. Adaptive Implementation and Monitoring Framework

- Pg. 217 – When describing the desired outcomes of the LaVA project, desired outcome 4 lumps protecting infrastructure and municipal water supplies and restoring wildlife habitat together. Wildlife habitat and protecting infrastructure appear different enough in their objectives to split into 2 separate desired outcomes.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Katie Cheesbrough, Terrestrial Habitat Coordinator, at 307-760-0489.

Sincerely,

Angi Bruce
Habitat Protection Supervisor

AB/mc/ml

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LITERATURE CITED

Krasnow, K.D. and S.L. Stephens. 2015. Evolving paradigms of aspen ecology and management: impacts of stand condition and fire severity on vegetation dynamics. Ecosphere 6(1):12.